

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

JOSEPH WALKER,

Plaintiff,

v.

Case No. 20-CV-0487

CITY OF MILWAUKEE, *et al.*,

Defendants.

PLAINTIFF'S AMENDED LIST OF TRIAL WITNESSES AND TRIAL EXHIBITS

Plaintiff, Joseph Walker ("Walker" or "Plaintiff"), by his attorneys, OVB Law & Consulting, S.C., and hereby respectfully submits the following list of witnesses whom Plaintiff may call at trial to provide testimony in Plaintiff's case in chief or for impeachment purposes and trial exhibits which Plaintiff may use or offer into evidence, which list amends the disclosures set forth in Plaintiff's Pretrial Report dated October 2, 2023. (ECF Doc. 78).

A. Plaintiff's Trial Witnesses.

1. Joseph Walker, c/o OVB Law & Consulting, S.C., 826 N Plankinton Ave, Ste 600, Milwaukee, WI 53203
2. Joseph Avilo Walker Jr., c/o OVB Law & Consulting, S.C., 826 N Plankinton Ave, Ste 600, Milwaukee, WI 53203
3. Eustolic W. Caralampio-Alvarado, Address and phone number unknown.
4. Brenda R. Franco, 2541 S. 43rd Street, #102, Milwaukee, WI 53219, (414) 676-8137.
5. Jomar Hernandez, 1011 Avenue O NE, Winter Haven, FL 33881, (414) 554-0994.
6. Haitza Rosado, 2663 S. 15th Street, Milwaukee, WI 53215. Phone number unknown.
7. Lisa Purcelli, c/o Attorney Anthony Jackson, 200 East Wells Street, Milwaukee, WI 53202, (414) 286-8014.

8. Jeremy Gonzalez, c/o Attorney Anthony Jackson, 200 East Wells Street, Milwaukee, WI 53202, (414) 286-8014.
9. Tanya Boll, c/o Attorney Anthony Jackson, 200 East Wells Street, Milwaukee, WI 53202, (414) 286-8014.
10. Daniel Clifford, c/o Attorney Anthony Jackson, 200 East Wells Street, Milwaukee, WI 53202, (414) 286-8014.
11. Balbir Mahay, c/o Attorney Anthony Jackson, 200 East Wells Street, Milwaukee, WI 53202, (414) 286-8014.
12. Brett Huston, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
13. Nicholas Johnson, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
14. Steve Delie, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
15. Scott Lackovic, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
16. Rodney Young c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
17. Jason Dorava c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
18. Robert Crawley, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
19. Keith Kopcha, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
20. Anthony Schmitz, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
21. Randall Smith, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
22. Matthew Bell, c/o Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
23. Karen Dubis, Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.

24. Jeffrey B. Norman, Chief of Police, Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
25. Brad Houston, Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
26. Kevin Bolyard, Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
27. Timothy Lietzke, Milwaukee Police Department, 749 W. State Street, Milwaukee, WI 53233, (414) 933-4444.
28. David R. Polachowski, Milwaukee Fire Department, 711 W. Wells Street, Milwaukee, WI 53233, (414) 286-8948.
29. Colleen A. Crowe, MD, Froedtert Hospital, 9200 W Wisconsin Ave, Suite 2932, Milwaukee, WI 53226, (414) 805-2150.
30. Codner Panna, MD, Froedtert Hospital, 9200 W Wisconsin Ave, Suite 2932, Milwaukee, WI 53226, (414) 805-2150.
31. Kristine T. Hoiland, APNP, Froedtert Hospital, 9200 W Wisconsin Ave, Suite 2932, Milwaukee, WI 53226, (414) 805-2150.
32. Jill Munson, SW, Froedtert Hospital, 9200 W Wisconsin Ave, Suite 2932, Milwaukee, WI 53226, (414) 805-2150.
33. Sarah Ticcioni, RN, Froedtert Hospital, 9200 W Wisconsin Ave, Suite 2932, Milwaukee, WI 53226 (414) 805-2150.
34. Terri A. Deroon-Cassini, Psychologist, Froedtert Hospital, 9200 W Wisconsin Ave, Suite 2932, Milwaukee, WI 53226 (414) 805-2150.
35. Mark Ledesma, M.D., Renew Counseling, 1225 West Mitchell St, Suite 223, Milwaukee. WI 53204, (414) 383-4455.
36. Lyndon Steinhaus, M.D., Renew Counseling, 1225 West Mitchell St, Suite 223, Milwaukee. WI 53204, (414) 383-4455.
37. Jennifer Gates, LCSW, Renew Counseling, 1225 West Mitchell St, Suite

223, Milwaukee. WI 53204, (414) 383-4455.

38. Brian Landers, BSN, MPA, PO Box 803, Wisconsin Dells, WI 53965, (608) 393-3491.

39. Beth Brant, DNP, APRN, LSN, CPNP-PC, NSCN, MCP-C, 5999 Oswald Street, Westerville, OH 43081, (614) 270-1930.

40. Maribeth Sadie, Ph.D., c/o Trillium Care Group, 2363 S. 102nd Street, Suite 301, West Allis, WI 53227, (262) 782-8090.

B. Exhibits to be Offered at Trial.

In addition to the exhibits offered by Defendants, Plaintiff may offer the following exhibits at trial:

1.	Photograph of house at 2659 South 15 th Street, Milwaukee, WI 53215, exchanged in discovery, produced by the Defendants.
2.	Photograph of house at 2659 South 15 th Street, Milwaukee, WI 53215, exchanged in discovery, produced by the Defendants.
3.	Photograph of the exterior porch and stairs leading up to the 2659 South 15 th Street residence, exchanged in discovery, produced by the Defendants.
4.	Photograph of rifle, laptop, and cigarettes on bed with numeric label '21' on bed, exchanged in discovery, produced by the Defendants.
5.	Photograph of two numeric labels '22' and '23' underneath bed inside of the 2659 South 15 th Street residence, exchanged in discovery, produced by the Defendants.
6.	Photograph of handgun with a ruler and a numeric label '22' on top of something inside the 2659 South 15 th Street residence, exchanged in discovery, produced by the Defendants.
7.	Photographs of Plaintiff's injuries and clothing following the shooting, obtained during the Milwaukee Police Department Investigation
8.	Photographs of Luann Will and Joseph Avilo Walker Jr. obtained during the Milwaukee Police Department Investigation
9.	Plaintiff's medical bills from Froedtert Hospital from dates of service from April 6, 2014, to April 9, 2014.
10.	Plaintiff's medical records from Froedtert Hospital from dates of service April 6, 2014, to April 9, 2014.
11.	Plaintiff's medical bills from Trillium Care Group, LLC from dates of service April 17, 2018, to May 26, 2022.
12.	Plaintiff's medical records from Renew Counseling Services, from dates of service November 1, 2017, to April 19, 2018.
13.	Plaintiff's medical bills from Renew Counseling Services, from dates of service November 1, 2017, to April 19, 2018.

14.	Video footage and accompanying audio recording of squad video from Milwaukee Police Department user 017917, Car 246 from April 6, 2014.
15.	Audio and transcription of Internal Affairs interview of Balbir Mahay on June 3, 2014.
16.	Audio and transcription of Internal Affairs interview of Daniel Clifford on June 3, 2014.
17.	Audio and transcription of Internal Affairs interview of Jeremy Gonzalez on June 3, 2014.
18.	Audio and transcription of Internal Affairs interview of Tanya Boll on June 5, 2014.
19.	Internal Affairs interview of Balbir Mahay administered on April 6, 2014.
20.	Google map of South 15 th Street in Milwaukee, Wisconsin, specifically marking the subject residence at 2659 S. 15 th Street, Milwaukee, WI 53215 from the deposition of Balbir Mahay administered on October 13, 2022
21.	Balbir Mahay's Milwaukee Police Department Police Academy Training Record.
22.	Deposition Transcript of Lisa Purcelli - November 4, 2022.
23.	Internal affairs interview of Lisa Purcelli on April 6, 2014.
24.	Deposition Transcript of Tanya Boll - January 5, 2023.
25.	First internal affairs interview of Tanya Boll on April 6, 2014.
26.	Diagram of the Subject Scene from Deposition of Tanya Boll - January 5, 2023.
27.	Milwaukee Police Department's Investigation Employee Case File History for Lisa Purcelli.
28.	Tanya Boll's Milwaukee Police Department Police Academy Training Record.
29.	Deposition Transcript of Daniel Clifford - October 19, 2022.
30.	Internal affairs interview of Daniel Clifford on April 8, 2014.
31.	Deposition Transcript of Balbir Mahay – October 13, 2022.
32.	Internal affairs interview of Balbir Mahay on April 6, 2014.
33.	2 nd Internal affairs interview transcripts for Balbir Mahay – June 3, 2014.
34.	2 nd Internal affairs interview transcripts for Daniel Clifford – June 3, 2014.
35.	2 nd Internal affairs interview transcripts for Jeremy Gonzalez– June 3, 2014.
36.	2 nd Internal affairs interview transcripts for Tanya Boll – June 5, 2014.
37.	Google map of South 15 th Street in Milwaukee, Wisconsin, specifically marking the subject residence at 2659 S. 15 th Street, Milwaukee, WI 53215 from the deposition of Daniel Clifford

38.	Daniel Clifford's Milwaukee Police Department Police Academy Training Record.
39.	Daniel Clifford's Milwaukee Police Department Investigation Employee Case File History.
40.	Deposition Transcript of Jeremy Gonzalez - November 9, 2022.
41.	Internal affairs interview of Jeremy Gonzalez on April 6, 2014.
42.	Google map of South 15 th Street in Milwaukee, Wisconsin, specifically marking the subject residence at 2659 S. 15 th Street, Milwaukee, WI 53215 from deposition of Jeremy Gonzalez
43.	Milwaukee Police Department's Investigation Employee Case File History for Jeremy Gonzalez.
44.	Defendant Gonzalez's Milwaukee Police Department Police Academy Training Record.
45.	Milwaukee Police Department's Standard Operating Procedure 085- Citizen Contacts, Field Interviews, Search and Seizure of the Milwaukee Police Department
46.	Milwaukee Police Department's Standard Operating Procedure 160- Mentally Ill Persons of the Milwaukee Police Department
47.	Milwaukee Police Department's Standard Operating Procedure 250- Communications of the Milwaukee Police Department
48.	Milwaukee Police Department's Standard Operating Procedure 460- Use of Force of the Milwaukee Police Department
49.	Milwaukee Police Department's Standard Operating Procedure 460- Use of Force of the Milwaukee Police Department
50.	Milwaukee Police Department's Standard Operating Procedure 466- Patrol Rifle of the Milwaukee Police Department
51.	Milwaukee Police Department's Standard Operating Procedure 730- Mobile Digital Video/Audio Recording Equipment of the Milwaukee Police Department
52.	Defendants' Responses to Plaintiff's First Set of Written Interrogatories and Requests for Admission
53.	Defendants' Responses to Plaintiff's Second Set of Written Interrogatories and Requests for Admission
54.	Report of Plaintiff's Expert Witness Brian Landers
55.	Report of Plaintiff's Expert Witness Beth Brandt
56.	Treatment Notes of Maribeth Sadie
57.	Video of the Scene of the shooting from Joseph Walker

Respectfully submitted this 3rd day of November 2023.

OVB Law & Consulting, S.C.
Attorneys for Plaintiff

Electronically signed by:

s/ O. Emil Ovbiagele

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s/ Samantha H. Baker

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